

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

JOSEPH BOYD,

Plaintiff,

**NOTICE OF MOTION TO SEAL**

-against-

Case No.: 6:21-cv-6651

STEPHEN M. OSBORN, ESQ.,

Defendant.

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**PLEASE TAKE NOTICE** that, upon the Declaration of Joshua M. Agins, dated December 7, 2021, defendant Stephen M. Osborn, Esq. (“Osborn”) shall move this Court before the Hon. Frank P. Geraci, Jr. at the Kenneth B. Keating Federal Building, 100 State Street, Rochester, New York, at a time and date to be determined by the Court, for an Order, pursuant to Rule 5.3 of the Local Rules of Civil Procedure for the Western District of New York, and Rule 2(R)(i) of the Administrative Procedures Guide for Electronic Filing for the Western District of New York, directing that the unredacted Exhibit 1 to the Declaration of Stephen M. Osborn, which contains confidential attorney-client communications, be filed under seal and, to the extent required, a redacted version of the same to be filed electronically through the Court’s CM/ECF system by Osborn or the Office of the Clerk.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 7(a) of the Local Rules of Civil Procedure, to the extent there is an opposition, Osborn intends to file and serve reply papers, and any opposition must be served in accordance with Rule 7(b) of the Local Rules of Civil Procedure.

Dated: December 7, 2021

**WARD GREENBERG HELLER & REIDY LLP**

/s/Joshua M. Agins  
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